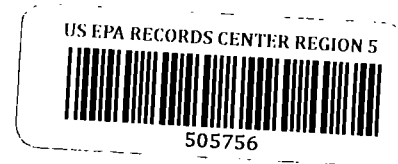




**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**



SENT VIA EMAIL

October 5, 2011

Mr. Stephen Quigley
Conestoga Rovers & Associates
651 Colby Drive
Waterloo, Ontario
Canada N2V 1C2

RE: EPA Modifications to South Dayton Dump and Landfill Site
Operable Unit 1 Streamlined Remedial Investigation/Feasibility Study Report

Dear Mr. Quigley:

The U.S. Environmental Protection Agency (EPA) has received your letter of September 30, 2011 concerning the South Dayton Dump and Landfill site. The Agency would like to assure you that EPA is still very interested in evaluating the MatCon asphalt cap as a viable cleanup alternative for business areas of the site.

EPA agrees that businesses can be located on top of Superfund sites and remedies can be designed to be protective of workers at those businesses. This means, however, that the reports and cleanup plans for these sites must be able to explain how these cleanups will meet EPA's statutory requirement to protect public health and the environment, and how they address EPA's other evaluation criteria, including short-term and long-term protectiveness, with consideration given to the workers, customers and traffic expected at the site on a daily basis.

As you are aware, EPA is very concerned about the high levels of methane, volatile organic compounds (VOCs) and naphthalene detected in subsurface landfill gas (LFG) at the site, some of which is in close proximity to occupied businesses. As such, EPA requested, and the Respondents agreed, to conduct a vapor intrusion study (VI) at the site to determine if any on-site or near-site buildings need to be immediately vented.

Your letter correctly points out that the VI study and pre-design studies have not been completed to confirm there is a current risk to receptors. However, a remedial action objective for the site is to: *"Control and, if necessary, treat landfill gas and soil vapor within OU1 that pose an unacceptable current or potential future risk to human health or the environment"* (emphasis added).

CRA's limited RI documented unacceptable levels of subsurface LFG, including methane and non-methane organic compounds, at the site. As such, any cleanup alternatives evaluated for the site must discuss how the extent and source(s) of the LFG contamination at the site will be further investigated as part of the remedial design, and controlled over the long term to ensure this potential future risk will not become a current risk, if a low-permeability cap is installed over the landfill and as building conditions change or deteriorate over time.

Finally, I would like to confirm that EPA will be able to accommodate your request to be given an opportunity to review the modified RI/FS Report before the Agency releases it to the public.

Thank you again for your assistance in providing EPA with electronic copies of the extensive RI/FS files for the site. I look forward to continuing to work with you as EPA issues the proposed plan and record of decision for OU1, and start work on OU2. In the meantime, if you have any questions or would like to discuss any of your concerns further, please feel free to contact me at 312-886-1843 or via email at cibulskis.karen@epa.gov.

Sincerely,



Karen Cibulskis
Remedial Project Manger

Cc: T. Prendiville, SR-6J
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K. Brown, ITW